

Memo from

To:

JOSHUA LEDERBERG

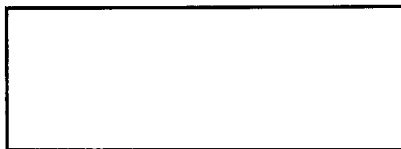
Phil Handler

JAN 13 1977

:: :: TSCA

I agree that the legislation, if read as you and I would prefer, responds to the most urgent needs of the research community. But the administrator has such enormous latitude-- my concern is how to be sure he is well advised about that flexibility.

I would urge you to inquire what advisory mechanisms the EPA intends to employ in setting up its draft regulations and definitions in this area; and my hunch it would be a good idea to establish or instruct a standing committee of the NAS to be sure there is a well-informed group with some authority, ready to speak at short notice. There are always going to be some incidents -- take the  $\text{Pb}(\text{N}_3)_2$  that is now a hot issue as an explosive residue -- that can be used as a pretext or focus of pressure for more restrictive approaches, such as ARE within the administrator's discretion. The law is so tricky that any scientific group is going to need very careful briefing to avoid legal and bureaucratic shoals in its arguments.



PROFESSOR JOSHUA LEDERBERG  
Department of Genetics  
School of Medicine  
Stanford University  
Stanford, California 94305